

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	CRIMINAL NO. 19-888
)	
v.)	
)	
JUAN ROJAS HERNANDEZ,)	
)	
Defendant.)	
<hr style="border: 1px solid black;"/>)	

EMERGENT MODIFICATION OF BAIL CONDITIONS AS TO RESIDENCE

COMES NOW the defendant, Juan Rojas Hernandez, by and through his undersigned counsel, Howard Brownstein, Esq., and with objections from Vijay Dwen, Assistant U.S. Attorney for the District of New Jersey, and Vincent Imbrosciano, U.S. Pretrial Services Officer, District of New Jersey, states as follows:

1. Defendant, Juan Rojas Hernandez was arrested on November 5, 2019 on a criminal complaint. The Government moved to detain Mr. Rojas Hernandez on February 21, 2020. A formal detention hearing took place before United States Magistrate Judge James B. Clark, III.

2. On December 22, 2020, based on a Consent Order executed by Chief Magistrate Judge Mark Falk, the Defendant was released on a \$100,000.00 unsecured appearance bond, under home confinement and subject to location monitoring and ankle bracelet. The Government and Pretrial consented to our bail application.

3. On January 2021, the defendant executed a plea agreement whereby the parties agreed that a sentence between 12 and 15 months, or time served, is reasonable.

4. On February 19, 2021, an Order [57] granting Motion to Modify Conditions of Release allowing the defendant to seek and accept employment was executed by the Honorable Judge Brian R. Martinotti. Again, the Government and Pretrial consented.

5. Under Conditions of Bail, the defendant was to reside with his brother Roy Rojas, who at the time lived on his own. Since then, Mr. Roy Rojas' wife and child have moved to the apartment. On March 19, 2021, the defendant informed his attorney and pre-trial services that he has been asked to vacate his current residence by April 1, 2021.

6. It is respectfully submitted that Mr. Rojas only options are to move in with his girlfriend and child or return to jail.

7. It is respectfully requested the conditions of bail be modified to allow the defendant, Juan Rojas Hernandez, to move in with his girlfriend and child. His girlfriend, Maria Rodriguez, wants and agrees to this move. There was never a restraining order or no contact order issued. In fact, the domestic violence violation was dismissed in Newark Municipal Court. [See attached Affidavit of Maria Rodriguez]

8. Jose Rojas Hernandez, respectfully requests the conditions of bail be modified to allow him to change address to 12 Delmar Road, Jersey City, New Jersey, Basement Apartment, where Maria Rodriguez lives alone. He will continue to be under supervision from U.S. Pre-Trial Services, District of New Jersey.

9. All other conditions of bail shall remain the same.

Respectfully Submitted,
BROWNSTEIN & ASSOCIATES, P.C.

By: /s/Howard B. Brownstein
HOWARD B. BROWNSTEIN

Dated: March 23, 2021

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	
)	
v.)	ORDER
)	
JUAN ROJAS HERNANDEZ,)	CR. NO.: 19-888
)	
Defendant.)	
)	

THIS CASE came before the Court on an application to modify conditions of bail, allowing the defendant, Juan Rojas Hernandez, to change residence. The Court having reviewed the pertinent information and being duly advised, it is hereby,

ORDERED and ADJUDGED that the application to modify conditions of bail, allowing the defendant to change address/move to 12 Delmar Road, Jersey City, New Jersey with his girlfriend Maria Rodriguez is hereby _____; and it is further

ORDERED and ADJUDGED that defendant will be monitored by U.S. Pre-trial Services, District of New Jersey; and.

IT IS further ORDERED that all other conditions of bail shall remain the same.

DONE AND ORDERED in Chambers at the United States District Courthouse in the District of New Jersey, this _____ day of March 2021.
